

To: Harvey, Dale@Waterboards[Dale.Harvey@waterboards.ca.gov]
From: Dermer, Michele
Sent: Fri 12/11/2015 9:14:32 PM
Subject: RE: Tentative Alon aquifer exemption meeting

Thanks Dale, that is very helpful.

From: Harvey, Dale@Waterboards [mailto:Dale.Harvey@waterboards.ca.gov]
Sent: Friday, December 11, 2015 12:48 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Tentative Alon aquifer exemption meeting

Although Alon did mention it wanted to know our concerns about the AE application, I get the feeling the discussion will not be limited to the AE and may include discussion about our permit. As far as meeting format, since Alon requested the meeting my intent was to welcome them and ask how we can help them. I will inject our concerns when the opportunity arises. I did not plan on sending Alon the comments I provided to you.

We did intend to informally (e.g. email) provide specific comments/questions on EPA's draft review comments (checklist), but they should be minimal and we should be able to get those to you Monday.

Dale

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]
Sent: Thursday, December 10, 2015 4:47 PM
To: Harvey, Dale@Waterboards
Cc: Rodgers, Clay@Waterboards; Cregan, Alan@Waterboards; Albright, David
Subject: FW: Tentative Alon aquifer exemption meeting

Thanks so much for sending this over Dale.

Are you planning on providing these in writing to Alon before next Wednesday's meeting, or just discussing it with them? Also, you had indicated at one point that you may have input on EPA's review comments that I had sent, or is this what you are going to rely on for your feedback on

the AE application? I am trying to get a sense of timing for EPA to provide its comments to Alon.

As far as a rumor of expansion, I am not aware of anything more recent, but their 2011 UIC application to EPA was for quite a few new injection wells, somewhere in the neighborhood of five or more, so that would be consistent. Thanks again for sending. Just let me know about your intended format for the call next Wednesday.

Sincerely,

Michele

Michele Dermer

Drinking Water Protection Section

US EPA Region 9

(415) 972-3417

dermer.michele@epa.gov

From: Harvey, Dale@Waterboards [<mailto:Dale.Harvey@waterboards.ca.gov>]

Sent: Thursday, December 10, 2015 4:29 PM

To: Dermer, Michele <Dermer.Michele@epa.gov>

Cc: Cregan, Alan@Waterboards <Alan.Cregan@waterboards.ca.gov>; Rodgers, Clay@Waterboards <Clay.Rodgers@waterboards.ca.gov>

Subject: RE: Tentative Alon aquifer exemption meeting

Hi Michele. Attached are some informal comments that our staff put together. Additionally, we have heard rumor that the reason Alon wants the exemption is because it intends to ramp-up operations and does not have the needed capacity. In addition to the attached comments regarding the AE application, we are also concerned that the existing injection project that we permitted was based on a specific design life of 20 years, which is long past. We do not know how far the plume associated with this injection has gone. I hope to bring this issue up at the meeting.